

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

RICHARD SCHUELER aka RICHARD
HEART, HEX, PULSECHAIN, and
PULSEX,

Defendants.

Civil Action No. 1:23-cv-05749-CBA-PK

**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

PLEASE TAKE NOTICE that upon the annexed Declaration of Michael E. Liftik, dated January 16, 2024, and the Certificate of Good Standing annexed thereto, Defendant Richard Schueler aka Richard Heart hereby moves through his undersigned counsel for an Order pursuant to Rule 1.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, admitting the undersigned *pro hac vice*, in the above- captioned action and for such other and further relief the Court deems just and equitable.

I am a member in good standing of the Bars of the District of Columbia, the State of California, and the Commonwealth of Massachusetts. I have never been convicted of a felony and there are no pending disciplinary proceedings against me in any federal or state court. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

Dated: January 16, 2024
Washington, D.C.

Respectfully Submitted,

QUINN EMANUAL URQUHART &
SULLIVAN, LLP

By: /s/ Michael E. Liftik
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*Attorneys for Defendant Richard Schueler aka
Richard Heart*